



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

MAR 14 2000

William Metzger  
Chemsico  
Division of United Industries Corp.  
Box 15842  
St. Louis, MO 63114

Dear Mr. Metzger:

Subject: Proposed Consumer Use Testing  
Chemsico Insect Bait A  
EPA Registration No. 9688-134  
Submission dated December 22, 1999

We have reviewed the proposed consumer test protocol and have the following comments:

1. **Identification of Study Participants.** Participation in the survey should be restricted to consumers who have purchased the product. Increase the number of participants in the survey from 50 to 100 because it is likely that many consumers may drop out the survey as was evident in the first consumer survey Chemsico conducted for this product.
2. **On-Site Interview.** This section is acceptable provided you ask questions to gain the information listed in the survey concerning installation date, number of stakes installed etc. In addition, ask consumers to identify critical areas and the qualifying criteria. As suggested by the Labeling Unit in the attached comments, tell consumers to record the information they will need for the follow-up interview three months later.
3. **Follow-up Interview.** Ask consumers if the product met their expectations. Why or Why not?
4. Ask consumers what directions they had difficulty understanding during all aspects of this survey.

Thank you for your cooperation in this matter. If you have any questions, please contact Kevin Sweeney at (703)-305-5063.

Sincerely,

George LaRocca  
Product Manager 13  
Insecticide Branch  
Registration Division (7505C)

Attachment

## **Labeling Unit Comments**

**23 Feb 2000**

**Note to Kevin Sweeney and George Larocca**

**Subject: Proposed Test Protocol for Consumer Application of Chemsico Insect Bait A**

I have the following comments/questions on the proposed test protocol:

Item 12A - Id of study participants - how is "intent to purchase" determined. If a consumer simply looks at the product in the store is that intent, or will they have to be "in the check out line" for example. Will they be paid at that time, or after the study is completed - might affect actual participation.

Item 12B - fine

Item 12C - on-site interview - Generally if you simply ask someone if they had any difficulty reading or understanding the label, the answer you're going to get is "no." It might be better for Chemsico to develop a few questions about specific, critical info on the label that would then indicate whether the participant understood it or not.

For example,

- Did the label require you to use gloves/goggles/... when installing the bait sticks? If so, did you wear them.

- Were there enough/too many stakes in the package for your (house/structure, whatever)

- How did you determine the best/most critical locations to place the stakes

If the 6 questions in item C are the ones designed to elicit this information, they're okay, but you might want to add a couple regarding info in the precautionary statements or any other unique or critical info on the label you're not sure they're reading (see my examples above).

Item 12D - fine as it stands, but be advised that unless they've written it down while they're doing it, they aren't going to remember much, or they'll overestimate what they saw. Might be better if they're asked in Item C to write down any info regarding monitoring or inspections.

Amy Breedlove  
308-9069